## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

OF NORTHERN ILLINOIS PENSION FUND AND WELFARE FUNDS,	) ) )
Plaintiff,	)
	) No. 08 C 516
V.	)
	) Judge Bucklo
PORTER CARTAGE, INC.	) Magistrate Judge Ashman
an Illinois corporation not in good standing, and	)
ROB PORTER, Individually	)
,	)
Defendants.	)

## MOTION FOR TURNOVER ORDER

NOW COMES the Plaintiff, TRUSTEES OF THE SUBURBAN TEAMSTERS
OF NORTHERN ILLINOIS WELFARE AND PENSION FUNDS, through its attorneys,
ARNOLD AND KADJAN, and moves this court for an Order directing Founders Bank to
turn over the sum of \$999.17 which they are holding pursuant to a Citation to Discover
Assets. In support of its motion, Plaintiff states:

- 1. On May 15, 2008 Founders Bank's response to Plaintiff's Citation to Discover Assets stated it was holding \$999.17 (see attached).
- 2. Founders Bank advised on May 15, 2008 that it would turn over said sum of \$999.17 upon receipt of an appropriate turnover order.

WHEREFORE, Plaintiffs pray this Court to issue an Order directing Founders Bank to turn over the amount of \$999.17 it is holding.

TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND

By:

One of Its Attorneys

JOHN J. TOOMEY ARNOLD AND KADJAN 19 W. Jackson Boulevard Chicago, Illinois 60604 (312) 236-0415 LAW OFFICES

## WOLFENSON, SCHOUTEN & BURKE LTD.

A PROFESSIONAL CORPORATION

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May 15, 2008

Via Facsimile (312) 341-0438

Arnold and Kadjan ATTN: John J. Toomey 19 West Jackson Boulevard Chicago, IL 60604

## NOTICE OF AMENDED ANSWER

RE: Trustee of Suburban Teamsters v. Porter Cartage Inc. Case No. 07 C 516

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Dear Attorneys:

Please be advised that this office represents Founders Bank relative to the Citation to Discover Assets served upon it in the above identified proceedings.

Founders Bank is Answering to the Citation as follows:

Checking Account No. 5068630
Funds available to Plaintiff under Citation - \$999.17

The name on the account is Porter Cartage Inc., 6203 Santa Barbara Court, Plainfield, IL 60544. A copy of the prior Answer of Founders Bank dated April 28, 2008, is enclosed.

Please direct all future communications to me.

Very truly yours,

Richard E. Burke

REB:kas